

Assn of America's Public Television Stations

- should be required to discount broadband facilities for schools and libraries; high speed data links also
- do not straightjacket by describing technical facilities eligible for discounts
- discounts should include consortiums of public television stations that provide distance learning and other content to schools; says Conference report specifically allows that
- describes programs in some states in detail; indicates these services could be more widely available if allowed at discounted rates

Mountaineer Doctor Television

- eliminate lata boundaries for education, healthcare; suggest recurring flat rates, discounted mileage charges

Edgemont Neighborhood Coalition

- little faith in the marketplace to bring needed services to urban areas
- must bring Superhighway (Internet) to the neighborhood: to the schools, libraries, community centers
- no resale provision cannot impede partnerships

National Council of La Raza, et al

- policie swich perpetuate status quo will deepen the disparities; need for equity in urban schools

Libraries

American Library Assn

- any telecommunications service offered by carrier by tariff or contract should be available to libraries at discount
 - should be available at lower of either (1) lowest price offered to any customer or (2) TS-LRIC; similar to wholesale rates, covers cost plus ROI
 - recommend it not be reimbursed from USF nor offsets to contributions to USF except in rural high cost areas
 - rural high cost should receive further discounts on core and special services through mechanism which averages rates
- prohibitions against reselling should not discourage sharing networks with parties ineligible to receive funds
- any definition of core services must include entry level access to the Internet; special services should include any telecommunications service
- text-based access to the Internet is not effective public access; broadband connections are required for libraries and their users
 - libraries require a range of switched broadband high speed services to allow multimedia info to numbers of simultaneous users
- need flat rate pricing to explore use of advanced services under traditional budget restraints

Michigan Library Association

- technical requirements for MLA Action plan:
 - LAN, ethernet, ISDN
 - T1 as basic service
 - will need > T1 high speed (broadband) and ATM over next 5 years
- service quality critical; suggests performance index; providers receive more or less support based on index

- essential services:
 - voice grade for fax, data; telecom relay service for voice-to-text, voice mail, internet access, local, 800 long distance
 - ISDN, T1, frame relay, broadband, ATM
- data, video must be two way interactive; gateway switching
- need free or low cost flat rate access
- must support buying cooperatives to aggregate demand, provide other services such as training, support
- ongoing consumer advisory board should determine necessary services required
- funding should be cost-based
- standards should include costs of ongoing training and support provided by providers
- recommends discounts for two-way interactive video, high speed data, toll access to Internet; direct internet access
- avg cost to provide service should be made publicly available; same terms and conditions for all schools, libraries in service area; internet access
- discount should be distance insensitive; also consider principles of universal service, utility of usage in schools, libraries, degree to which cost is a barrier to service acquisition
- discounts should be on a transitional basis

California Library Association

- discounted access to any telecom service should be available to libraries and schools;
- need affordable long distance rates; affordable is no more than price of a local call
- need access to high speed data adequate to transfer video, graphics, sound
- sharing: avoid discouraging cost-recovery measures for services that would otherwise be fiscally prohibitive; avoid discouraging cooperative projects

California State Library

- high speed electronic access to info is a basic service; rules of universal service should apply to advanced telecom
- rural areas should be equipped with capacity to access all info formats at equivalent costs of urban areas (cost of a local call)
- libraries supported through free or minimal telecom costs; subsidies for increased hours could also be considered
- some related costs should be permitted to be passed on to users and not considered resale

Sailor (Maryland)

- provides free statewide public Internet access to all Maryland residents
- residents can dial into Sailor with a local telephone call with 24 hour access
- Internet is an essential vehicle to accomplish library goals
- must ensure that library USF mechanism benefits the libraries and not the telecom delivery system; a nominal discount will not achieve that goal
- need for flat rate pricing; non-toll local tel number for Internet
- Commission must use price comparison yardstick; If price for services is exorbitantly high, a nominal 50% discount is ineffective
- must look at prices offered to other customers and marginal cost of services; endorses ALA thoughts: should be available at lower of either (1) lowest price offered to any customer or (2) TS-LRIC; similar to wholesale rates, covers cost plus ROI; funding reimbursement unnecessary

Washington State Library

- traditional definitions of core services inadequate for libraries; services considered as advanced may now be core services

- cannot penalize high cost, rural areas; access to sophisticated service must be within reach of all libraries
- no resale provisions should not discourage partnerships; limit resale prohibition to the technology, not to the product/service
- defining service levels in terms of goals: because technology is changing at a rapid rate, service levels will be defined in terms of results to be achieved, rather than in terms of a specific service or technology
- minimum set of capabilities: digital access to both graphics and text which has the capacity to support multiple workstations

National Commission on Libraries and Information Science

- libraries needs to be more carefully defined: public and NFP-private schools; academic libraries in colleges, universities, research institutions; federal, state, local govt libraries; law libraries; medical libraries; state library agencies; public libraries; NFP cooperative systems and networks; support service networks all need access
- libraries need range of discounted rates: discount might be made based on population of libraries local service area, level of per capita support provided to public library, or the total operating income of other types of libraries
- separately administered fund for USF

Massachusetts Board of Library Commissioners

- member libraries are connected by 56KB; bandwidth is becoming inadequate as web, GUI interfaces are deployed
- need discounts on core services; need rates that are comparable or lower than urban libraries for similar services
- at a minimum, access to online services, including but not limited to the Internet
- discounts should apply to installation of lines and equipment
- when possible, flat rates should be used
- library networks should be able to order, pay for services for members
- definition of eligible libraries poses some problems
- discounts needed for high speed access; frame relay, ISDN, DDS, fractional T1, ATM, SONET, Internet connectivity, videoconferencing, wide area networks
- portion of charges for statewide backbones used by schools, libraries should be discounted

Oklahoma Dept of Libraries

- SBC providing toll free access to Internet within lata for schools, libraries, healthcare
- universal service for schools, libraries must include access to Internet; also need flat rate service for connections to Internet; rural areas must often pay long distance charges
- also need support for purchase of equipment (hardware) and access to funds for training

Alaska Library Assn

- services essential to education must be determined by school districts and libraries through their individual and collective purchases at discounted rates
- additional services to be included as advanced capability: frame relay, voice mail, high speed Internet access, e-mail, high speed transmission and broadband services should be considered as basic for schools, libraries
- schools, libraries must have access to all available advanced services at discounted rates
- essential to allow cooperative projects

Missouri State Library

- distance learning, access to and cost of teleconferencing are critical issues

- flat rate costs are most effective way to provide access to advanced services

North of Boston Library Exchange

- bandwidth needs are ever increasing; need fractional T1, T1, some T3; these should be provided at substantial discount
- need to include non-profit consortia of libraries as eligible recipients

Lincoln Trail Libraries System

- universal service needs: each library needs direct connection to an Internet provider; dial access is insufficient; need toll free connections

Warren Library Assn

- all basic services should be discounted
- cost for providing discount should be spread evenly over all users of the services

State Regulatory Agencies

Texas PUC

- offer Texas statute as model: note Attachments I-IV
- services: all LEC's that use incentive regulation required to provide advanced services to 45MB upon request at 105% of LRIC; also those not under incentive regulation required to make available at preferred rates; tariffs require discounts to education and certain library programs
- created supply side requirements for infrastructure upgrades and discounts; but also created demand side incentives with Telecommunications Infrastructure Fund (\$150M per year for grants, loans for equipment).
- infrastructure reqt: broadband available upon request @ 105% of LRIC; interoffice broadband reqts recovered on statewide average distance insensitive basis @ 105% T1 at flat rate at 105%; also access to IXC's at 105%; no special construction or installation charges; six year contracts; also requires toll-free connection or dialing arrangement to Internet at no charge (until Internet access available) (restricted to companies with 5M access lines and above)
- reduced rates for distance learning; starts at 75% of applicable rate until cost rules completed for LRIC.
- Telecommunications Infrastructure Fund: \$150M for ten years, half from telecom utilities and half from commercial mobile service providers;

Wisconsin PSC

- Already statutorily require digital access lines, high speed data transfer capability, two-way interactive video: LEC's must make advanced services available upon request of customer at affordable prices; commission resolves disputes; favors state control
- already discount two way interactive video, high speed data transfer, toll access to the Internet, direct Internet access for schools, libraries, NF hospitals
 - discount for new services only @ 30% first year (or \$300/mo), 20% second year (or \$200/mo), 10% third year, no discount beyond; no such scaling requirement for this Act

Missouri PSC

- core universal service for everyone should be toll free customer access to an Internet access provider
- target USF dollars to subsidize only those services that provide the greatest benefit; begin with (1) interactive video for schools, telemedicine (2) Internet access for

schools and libraries and (3) high speed digital transmission for telemedicine, teleradiology

- construe library to include community information networks for purposes of securing support; they serve many of the functions of a library
- avoid formulas that can be easily manipulated or that treat LECs inequitably; would result in some receiving disproportionate amounts of USF support
- provide discount as percentage off of a standardized indexed or computed price ; but discounted rate must be higher than LRIC for that service
 - don't want to have to subsidize, gives states some flexibility
 - establishes reasonable limit on support amounts coming from USF
- avoid penalizing companies that have already discounted rates for services
 - all but one of LECs have distance learning tariffs for necessary services at favorable rates
 - SBC offers flat rate statewide average rates at close to LRIC
 - some LECS may have trouble justifying a discount relative to their current rates
 - in contrast, a LEC that has not established a rate may be tempted to set rates arbitrarily high to offer huge discount and receive correspondingly large USF subsidy
 - if discount is percentage off, it penalizes companies that are already offering reduced prices

New Jersey Board of Public Utilities

- don't pre-empt their ability to provide distance learning at reasonable rates
- most projects initiated at local level; need for local control
- they have distance learning tariff discounted for schools, libraries, NFP's, cultural institutions; special needs districts given additional discounts

Iowa Utilities Board

- wants Iowa Communications network to be considered a telecommunications carrier eligible to receive reimbursement
- already significantly discounts its services significantly
- advanced must include Internet services

Oklahoma Corporation Commission

- supports the concept; describes OneNet which will receive SBC subsidies; SBC agreed to provide at no charge intralata long distance to Internet to all educational institutions until OneNet connections available or 1999
- their minimum service standards require 56KB availability to end users

New York Dept of Public Service

- services are primarily intrastate, hence responsibility for recovery is state's
- no need to harmonize federal and state discounts, will vary by state

Rhode Island PUC

- describes conflict in RI with NCTA comments on NYNEX regulatory settlement; NCTA says NYNEX agreement to furnish K-12 and libraries with data services is anti-competitive; NYNEX says agreements funded by shareowners; PUC points out that cable franchise agreements often require that free services be provided to schools

Wyoming PSC

- measurement model for which advanced services to provide should be national in scope; false results if measured on an exchange basis

Kentucky PSC

- unable to provide further comment until their case is completed; working on affordable rates, advanced services for schools, libraries

South Carolina PSC

- education specialists should determine which services are applicable

Florida PSC

- T1 and above should receive discounted connections and discounts on recurring charges; also voice grade internet access, 56KB access, ISDN
- need surveys to define mix
- discounts should not bring prices below cost; recommends fixed dollar discount
- would not include ESPs, might unduly impede their development of services; if include, consider differential rates of assessment

Maine, Montana, Nebraska, New Hampshire, New Mexico, Utah, Vermont, West Virginia PUC's

- Maine requires NYNEX to provide discounts and/or free service to schools and libraries. Plan is attached

Louisiana PSC

- already has "Educational Discount Program covering installations and monthly service for ISDN and T1; appendices on discount are not clear

Idaho PUC

- concern that schools and telcom carriers will "game" the system to enrich both at expense of general public
- only sound list is one that is "behind" the technology, limited to what we know can work and be provided now; technology will outpace list and create more bureaucracy to update it; make demand a driver
- insists on sharing of facilities; sale and resale provisions should be relaxed; allow schools to cost-share with local communities; partnerships
- providers should contribute access to Internet without definition of access line
- pick a discount number, say 20%, see if it is sufficient to stimulate uptake of services; revise; calculate discount from cost, not retail price
- unreasonable unnecessary burden for certification
- let schools decide what advanced services are; most important element in rapid deployment is better training of teachers

California PUC

- discounts required but premature to make recommendations

Pennsylvania PUC

- intends to provide comments after it confers with educational organizations

State Agencies

Iowa Communications Network

- wants to be considered a telcom carrier so it can be reimbursed under the fund
- wants definition of universal services to include advanced services, symmetrical facilities for full motion interactive video, high speed data, Internet services, standard equal access voice

Texas Department of Information Resources

- restrictions on sharing network capacity could have an adverse impact on rural communities
- suggests one incentive for broadband services is to auction two-three of N11 numbers to help generate demand
- advanced features should include data access to electronic directory services and the Internet
- establish time-lines for increasing speed of data access until broadband achieved

California Dept of Consumer Affairs

- most beneficial action FCC can take is to provide incentives for telcom market to deploy fiber broadband network; essential for deployment of new and yet-to-be-determined technologies schools will need; only when telcom and ISPs fail to offer adequate services should government intervene
- adding new telcom and info services to basic service could prove wasteful and expensive; one way to meet challenge is to provide to schools, libraries at reduced rates, allow consumers to have access to those services at modest fee which covers cost of providing; lifeline rate vouchers for poor

People's Counsel of District of Columbia

- all advanced services should be made available to schools, libraries at discount if other means of financing unavailable
- schools, libraries must be able to connect with each other, benefits must be available to all communities
- personnel need to be trained
- funding mechanism must not result in increase in basic rates; Commission should employ a variety of less traditional funding mechanisms to minimize impact; broaden number of contributors such as on-line services

Ohio Consumers Council

- Internet access, data transmission, enhanced services, broadband services should be made available publicly at libraries, schools

West Virginia Consumer Advocate

- carriers should be required to provide at least one 56 KB dedicated circuit to each school at a discount
- has a program in place direct Internet access to all schools in state

Not-for-Profits

Alliance for Public Technology

- vision of advanced universal service is high speed switched broadband capability for voice, data, graphics, video using any technology
- Commission must map out strategy, migration path from telephone-based universal service to advanced network vision
- universal support mechanism needs to kick in for advanced services as soon as feasible
- policies must reflect diverse needs of states, local communities
- schools and libraries need to share services with families; may have greater impact than wiring classrooms
- urges Commission to allow partnerships with other organizations and still be eligible to receive discounts
- financial incentives to states to develop market options to deploy advanced services

Citizens for a Sound Economy

- financing should be explicit and transparent; institutional subsidies must ultimately come from ratepayers and they should know what they're financing

Early Childhood Development Center

- glaring oversight not to include early childhood development centers
- if centers attached to elementary schools are eligible, so should stand-alone center
- should not be concerned by for- or not-for-profit status

Pennsylvania Rural Development Council

- rural areas must have access to ATM, ISDN

FARNET

- asks Commission to make distinction between access technologies necessary to deliver services and the enhanced services themselves
 - Internet service provisioning is already highly competitive market with multiple providers in every area; often providing discounts
- need to ensure adequate investment made in physical infrastructure to deliver high performance access to the Internet; e.g., ISDN not readily available (but it's not long run solution)

Learning and Information Networks for Community Telecomputing (LINCT)

- need low or no cost local access to Internet among schools, libraries, homes

System of Technology to Achieve Results (STAR)

- need public sites for access for people with low income, disabilities
- discount possibilities: one-half the minimum wage per hour of use; also actual costs plus ongoing educational component

National Exchange Carrier Assn

- can do discounts, model recovery after Lifeline Assistance

Labor

Communications Workers of America (CWA)

- universal service includes Internet access, interactive video and data transmission
- funding: 10% of USF fund should be dedicated for schools, libraries; apply difference between long run incremental costs and reduced rate as credit against contributions

American Federation of Teachers (AFT)

- supplement to School Boards filing to address additional subsidy for special services for school districts with significant concentrations of children in poverty
- propose additional "lifeline" or equity subsidy to assure poor schools can afford
- based on a formula such as Title I funding; must have at least 15% of youth eligible before additional subsidy applies.

Other

COMSAT:

- not allowed to provide interstate services, so it cannot provide funds to USF

Northern Marianas

- supports funding or price support for acquisition of modems and other hardware for schools
- supports free access for education from local and long distance providers

Governor of Guam

- all telcom and info services should be subject to universal support mechanisms for schools, libraries; schools, libraries must be able to subscribe to those services that further their unique goals
- should receive local service at residence rates

Bar of the City of New York

- at a minimum, all citizens should be provided with access to existing interactive services including the Internet through schools and libraries

BRITE Voice Systems

- satellite and wireless operators can provide more users with more services and info content than wireline carriers
- community access costs to schools, libraries can be amortized over other consumers in the community